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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

TIANMING WANG, *et. al*,

Plaintiffs,

v.

GOLD MANTIS CONSTRUCTION  
DECORATION (CNMI), LLC, *et. al*,

Defendants.

Case No. 18-cv-0030

**NOTICE OF MOTION**

Hearing Date: April 16, 2020

Hearing Time: 10:00 am

Judge: Hon. Ramona V. Manglona

**PLAINTIFFS' MOTION FOR SANCTIONS AGAINST DEFENDANT IPI**

Plaintiffs move the Court, based on the facts set forth in the Declaration of Aaron Halegua, dated March 10, 2020 and all exhibits attached thereto, pursuant to Fed. R. Civ. P. 37(b)(2), to impose sanctions against Defendant Imperial Pacific International (CNMI), LLC's ("IPI") for its violation of multiple discovery orders by this Court.

IPI has violated this Court's initial order to produce all discovery by January 13, 2020 (ECF Nos. 61, 79), and now also violated the stipulation so-ordered by this Court requiring it to produce all discovery by February 24, 2020 (ECF Nos. 77, 78).

Accordingly, Plaintiffs request that the Court issue an order pursuant to Fed. R. Civ. P. 37(b)(2) that: (i) directs IPI to produce all discovery and file a certifying declaration upon doing so; (ii) treats IPI's failure to obey this Court's orders as a contempt of court; (iii) imposes a civil contempt sanction of \$5,000 per day payable to the Court until IPI complies with those orders; (iv) warns IPI that any further noncompliance will result in harsher sanctions, up to and including striking its affirmative defenses, striking its pleadings, or entering a default judgment; (v) awards Plaintiffs' attorneys' fees in connection with IPI's disobedience of this Court's prior discovery orders; and (vi) imposes any other sanctions that the Court deems justified.

Respectfully submitted,

/s/

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